PENDING EMERGING REGRESSION SCOPE NEVADA FEDERAL CONTRACTOR FCI DOCUMENTATION ASSESSMENT

Indefinite Delivery Contract Scope and Accumulated Gaps

Across successive assessment cycles, WOSB-designated contractors in Nevada operating under indefinite delivery contracts subject to FAR 52.204-21 have accumulated Active FCI Posture Record conditions in which the boundary description falls short of what the contracting officer technical representative review environment expects at the point of observation. The record is current with respect to the present boundary or it is not. Indefinite delivery contracts expand FCI scope incrementally as task orders are issued, and the documentation either tracks each expansion or it does not. The broader population within the same certification and vehicle profile presents a condition in which confirmed records and unconfirmed records coexist, and neither observation precedes the other within the current review.

The incremental nature of task order issuance produces a condition in which the FCI boundary moves without a single identifiable event triggering the movement. A record whose contents reflect an earlier point in the organization's FCI boundary history may have been accurate at the time of its last confirmation but has since fallen below what assessment processes treat as a current description. Documentation either reaches the current environment or it does not reach it. Among WOSB contractors in Nevada, the gap between the recorded boundary and the present boundary widens with each task order that introduces new personnel, systems, or data flows into scope without corresponding record confirmation.

Configuration Management Records

The accuracy of an Active FCI Posture Record under an indefinite delivery contract depends on whether each task order's effect on the FCI boundary has been captured in the record. Neither condition has been resolved within the period the record covers. The contracting officer technical representative review environment observes that unconfirmed records are approaching a threshold at which the documented scope and the actual scope no longer bear correspondence. The record holds a current picture of the boundary or it holds an earlier one. Documentation that has not been confirmed against the current environment describes a condition that accumulates as task orders are issued without documentation follow-through.

The broader population within the same certification and vehicle profile carries records in which accessibility of the documented state varies depending on whether the record has been structured to accommodate scope expansion. A record that has not been updated since the triggering event addresses only the scope that existed at the time of its last confirmation. Both findings remain unresolved within the same documentation period. The record is either synchronized with the current environment or it has fallen behind it.

Assessment Coverage

Where task orders have expanded the FCI boundary across additional domains among the 15 requirements and 6 domains addressed by CMMC Level 1, the record either reflects each domain's current state or it does not. The two findings occupy the same assessment window: the contract's scope has grown and the record's scope has not. Documentation carrying a configuration the current environment has moved past describes the condition of organizations whose last record confirmation predates the most recent task order affecting the boundary. Assessment activity within the contracting officer technical representative review environment registers both conditions without resolving them.

Among the broader population within the same certification and vehicle profile, organizations whose records were confirmed before the most recent scope expansion carry documentation whose scope does not reflect the boundary as it currently exists. Neither state closes within the period the document addresses. The record matches the current environment or it does not.

Record Accessibility and Scope Alignment

An organization whose Active FCI Posture Record reflects the current FCI boundary inclusive of all task order scope expansions, whose record produces audit-ready output that is accessible without reconstruction across the full boundary as presently configured, and whose documented state corresponds to the environment at the point of review occupies the confirmed side of this divide. Neither state eliminates the other within the record. Documentation either covers the current boundary or it lapses at that edge.

A record in which the documented scope and the actual scope no longer correspond is present among WOSB contractors in Nevada whose indefinite delivery contract scope has expanded beyond the boundary described in the record. The record contains both at the same point in time: a confirmed description of a prior boundary and an unconfirmed present boundary that has moved past it. The contracting officer technical representative review environment registers this gap. Both are present in the same documentation window. Documentation either covers the present boundary or it stops at a prior one. The record either reflects the present FCI scope or it does not reflect it.